

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

**FEREYDUN TABAIAN and AHMAD
ASHRAFZADEH,**

Case No.: 3:18-cv-326-HZ

Plaintiffs,

**[PROPOSED] ORDER REGARDING
INTEL CORPORATION'S MOTION
FOR ENTRY OF PROTECTIVE ORDER**

v.

INTEL CORPORATION,

Defendant.

Intel Corporation ("Intel") has filed a Motion for Entry of Protective Order (ECF 84). Having fully considered the matter, IT IS HEREBY ORDERED that Plaintiffs shall be prohibited from: (1) using any information learned through Plaintiffs' counsel's contacts with former Intel employee James Steven Fintel or calling Mr. Fintel to testify; (2) seeking to question or call former Intel employee Shahrokh Shahidzadeh to testify (or rely on any statement by Mr. Shahidzadeh) about the '944 patent at issue in this case, Intel's evaluation of the '944 patent, Intel's alleged infringement or use of the '944 patent, or Intel's alleged use of any NuPower technology; or (3) engaging in any future communications with Mr. Fintel or Mr. Shahidzadeh.

IT IS FURTHER ORDERED that, should Plaintiffs seek to depose Mr. Shahidzadeh, Plaintiffs will contact Mr. Shahidzadeh only through Intel's counsel.

DATED: October ____, 2018

Hon. Marco A. Hernández
United States District Judge